



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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George V. Voinovich
Governor

September 3, 1998

RE: DOE-FEMP
COMMENTS: PSP FOR WAC
ATTAINMENT SAMPLING OF
AREA 7 SOILS

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's August 3, 1998 submittal, "Project Specific Plan for The On-Site Disposal Facility Waste Acceptance Criteria Attainment Sampling of Area 7 Soils (Silos Project Area - Phase 1)." Attached are Ohio EPA's comments on the document.

If you have any questions, please contact me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI GeoTrans
Francie Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR,CO

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PSP for WAC Attainment Sampling of Area 7 Soils

Commenting Organization: OEPA Commentor: OFFO
 Section #: General Comment Pg. #: Line #: Code: C
 Original Comment #:
 Comment: This PSP is not consistent with the SEP or WAC Attainment Plan for the OSDF regarding constituents sampled for in Area 7 soil piles. Please refer to the SEP, Section 4.3.3, page 4-27, Task-2 and the WAC Plan, Section 4.3.3, page 4-51 regarding sampling piles of unknown origin.

Commenting Organization: OEPA Commentor: OFFO
 Section #: General Comment Pg. #: Line #: Code: C
 Original Comment #:
 Comment: Ohio EPA believes DOE is underestimating the amount of debris that will be encountered in this area during construction. The PSP and Design should consider the impacts on construction activities and how will it impact sampling conducted with the Geoprobe®.

Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.1 Pg. #: 2 Line #: 7 Code: C
 Original Comment #:
 Comment: The K-65 trench is mentioned here and throughout the document. Please label the trench on Figure 2-1.

Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.2.1 Pg. #: 3 Line #: 3 & 4 Code: C
 Original Comment #:
 Comment: It is unacceptable to Ohio EPA to regrade Area A stockpile before sampling. Regrading an area before sampling has not been common practice in the past and Ohio EPA believes it is an inappropriate sampling technique.

Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.2.3 Pg. #: 3 Line #: 17 & 18 Code: C
 Original Comment #:
 Comment: This paragraph states that the Silos Project is planning to construct office trailers, a warehouse, etc. in Area C. In addition, this area will be WAC characterized through sampling efforts. However, it does not clearly discuss when or in what order these activities will occur. Please clarify.

Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.2.6 Pg. #: 4 Line #: 17-22 Code: C
 Original Comment #:
 Comment: When Area F was regraded with soil from the new drainage ditch and the storm water retention basin, was this soil clean? Also, where on-site is the ditch and retention basin located?

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Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.4 Pg. #: 7 Line #: 19 - 21 Code: C
 Original Comment #:

Comment: This first sentence states that real-time measurements will be used to *supplement* physical sample results. The next sentence states that it will be used *in lieu of* physical surface samples for total uranium. Please clarify.

Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.1 Pg. #: 9 Line #: 3 Code: C
 Original Comment #:

Comment: If real-time instruments detect total uranium above the trigger levels, then physical sample(s) should be collected to determine the extent of contamination both vertically and horizontally. Please correct.

Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.1 Pg. #: 9 Line #: 1 Code: C
 Original Comment #:
 Comment: Section 2.4.3 does not exist. Please correct.

Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.1 Pg. #: 9 Line #: 15 Code: C
 Original Comment #:
 Comment: This section states that all samples collected will be analyzed for total uranium, while lines 7 - 9 say that this is not the case. Please clarify.

Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.1.2 Pg. #: 10 Line #: 9 Code: C
 Original Comment #:
 Comment: This line states that samples will be collected to the planned cut depth. Does this cut depth take into consideration the tolerance in the design? If not, samples need to be collected to the maximum depth of that tolerance, i.e., cut depth = three feet, equipment tolerance = one foot, equaling a total of four feet of soil possibly disturbed. Samples in this area need to go to a depth of four feet.

Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.1.2 Pg. #: 10 Line #: 12-14 Code: C
 Original Comment #:
 Comment: Lines 12-14 states that for *undisturbed* soil areas surface samples will be collected. Ohio EPA finds it hard to believe that there are locations within Area 7 that are undisturbed. DOE should provide a justification for the assumption that undisturbed areas exist or treat all

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areas as disturbed.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1.2 Pg. #: 11 Line #: 1-2 Code: C
Original Comment #:
Comment: Please specify which three of the four sampling locations west of Silos 1 and 2 will be analyzed for total lead and chromium.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1.2 Pg. #: 11 Line #: 3-4 Code: C
Original Comment #:
Comment: This section states that the sampling locations will be based upon the construction *cut* or *fill*. However, after reviewing Figure 2-1 and the Silos Infrastructure Design Plans, the current sampling grid does not emphasize the *cut* areas over *fill* areas. Ohio EPA believes more sampling locations are needed in the cut areas.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1.4 Pg. #: 11 Line #: 31 Code: C
Original Comment #:
Comment: Please explain why sampling intervals are being skipped, i.e., 0.5'-1.0'?

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2 Pg. #: 13 Line #: 27 Code: C
Original Comment #:
Comment: As mentioned in a previous comment, it is unacceptable to Ohio EPA to regrade or reconfigure Area a stockpile before sampling. Regrading an area before sampling has not been common practice in the past and Ohio EPA believes it is an inappropriate sampling technique.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2 Pg. #: 13-14 Line #: 31-2 Code: C
Original Comment #:
Comment: If these three attempts at attaining a soil boring are unsuccessful, will the whole sample location be scrapped? With the distance between the sample locations being 40 feet (according to Figure 2-1), the OEPA feels that more attempts at a further radius would be proper to characterize the pile.

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Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2.3 Pg. #: 15 Line #: 12 Code: C
Original Comment #:
Comment: Ohio EPA believes that the beta/gamma reading of 100 cpm for the action level should be used in Area 7 as it was in A2P1.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2.4/Table 2-1 Pg. #: 16 Line #: Code: C
Original Comment #:
Comment: Is the second analyte listed in Table 2-1 Tc-99?

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.3 Pg. #: 17 Line #: 12 Code: C
Original Comment #:
Comment: This line should read 1.0-1.5 feet , not 1.0-15 feet. Please correct.

Commenting Organization: OEPA Commentor: OFFO
Section #: 3.0 Pg. #: 18 Line #: Code: C
Original Comment #:
Comment: In order to be consistent with the SEP and the WAC Attainment Plan, real-time measurements should be taken prior to physical sampling.

Commenting Organization: OEPA Commentor: OFFO
Section #: 3.5 Pg. #: 21 Line #: 6 Code: E
Original Comment #:
Comment: This line contains an extra period. Please correct.

Commenting Organization: OEPA Commentor: OFFO
Section #: 3.5 Pg. #: 21 Line #: 17 Code: C
Original Comment #:
Comment: This line states that a 0-6 inch core will be collected for percent moisture analysis. The Real-Time Users Guides states that a 4-inch core is proper for this analysis. Please revise.

Commenting Organization: OEPA Commentor: OFFO
Section #: Table B-1/Figure 2-1 Pg. #: Line #: Code: C
Original Comment #:
Comment: Sample identification numbers should be placed at the sample locations on Figure 2-1. Please correct.

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Commenting Organization: OEPA

Commentor: OFFO

Section #: Figure 2-1

Pg. #:

Line #:

Code: C

Original Comment #:

Comment: Sample locations should be added to the area of the culvert west of Silo 2 in Area B.
As it stands, there are no sampling points in that area. Please add.